JAN - 7 2018

U.S. DISTRICT COURT EASTERN DISTRICT COURT FOR THE EASTERN DISTRICT OF ST. LOUIS MISSOURI EASTERN DIVISION

DR. PATT MCGUIRE)
PLAINTIFF))
) Cause NO. 4:17-cv-02818CDP) Federal Court
VS.)
ST. LOUIS COUNTY, CLIFF FADDIS, CHERYL CAMPBELL, MARSHALL)
DAY, BEN BURKEMPER))
DEFENDANTS))

MOTION – PLAINTIFF IS REQUESTING THE COURT TO ADD CRIMINAL CHARGES TO PLAINTIFF'S EMPLOYMENT DISCRIMINATION CASE AGAINST DEFENDANTS COUNSELS CYHNTHIA LOU HOEMANN, PRISCILLA F. GUNN, VERITEXT LEGAL SOLUTIONS, AND ST. LOUIS COUNTY FOR TAMPERING WITH PHYSCIAL EVIDENCE

complaint on this case. The new criminal/civil charge is Tampering with physical evidence by both counsels of the current defendants, the court reporting company St. Louis County used for the Plaintiff's second deposition, and St. Louis County-Genevieve Frank. Their names are Cynthia Lou Hoemann, Priscilla F. Gunn, Veritext Legal Solutions, and St. Louis County. Attached to this motion is the Plaintiff's complaint. The complaint is detailing the violations. Since this criminal violation occurred during the Plaintiff's current employment discrimination case, the Plaintiff is adding these additional charges. The additional criminal charges are in the complaint with relief. They are: (1) section code 575.100, Section 1983, fourteenth amendment (due process, equal protection, and deprives of life, liberty, and property. Since the fake

document was presented during my deposition by Counsel Cynthia Lou Hoemann and Priscilla F. Gunn this case now becomes both criminal and civil.

The Plaintiff will be filing criminal charges with the St. Louis County Police Department in the immediate future since the crime took place at 41 S. Central Ave. St. Louis, MO 63105 on the 9th floor in one of the conferences room on December 17, 2018.

Respectfully Submitted,

Dr. PATT MCGUIRE PH.D.
DEPUTY DETENTION JUVENILE
OFFICER

/s/ Patt McGuire

Attorney Cynthia Lou Hoemann 41 South Central Ave St. Louis, MO 63105 Attorney Priscilla Gunn 41 South Central Ave St. Louis, MO 63105

Certificate of Service

I certify that the foregoing is true and accurate copy of the foregoing MOTION – PLAINTIFF
IS REQUESTING THE COURT TO ADD CRIMINAL CHARGES TO PLAINTIFF'S
EMPLOYMENT DISCRIMINATION CASE AGAINST DEFENDANTS COUNSELS
CYHNTHIA LOU HOEMANN, PRISCILLA F. GUNN, VERITEXT LEGAL
SOLUTIONS, AND ST. LOUIS COUNTY FOR TAMPERING WITH PHYSCIAL
EVIDENCE was served via United States postal mail, postage prepaid, this 7th day of January
of 2019, and via the Court registry, upon the following.

Attorney Cynthia Lou Hoemann

41 South Central Ave

St. Louis, MO 63105

Attorney Priscilla Gunn

41 South Central Ave

St. Louis, MO 63105

/s/ Patt McGuire 10164 Ventura Dr.

St. Louis, MO 63136

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Deputy Detention Juvenile Officer Plaintiff